To: Li, Corine[Li.Corine@epa.gov]
Cc: Yolanda Barney[ybarney@navajopublicwater.org]
From: Lee, Bessie
Sent: Tue 8/18/2015 9:11:31 PM
Subject: Historic Regulated and Unregulated IOC Data for Four Public Water Systems on the Navajo Nation - Gold King Mine Release
Montezuma Creek - Historic Unregulated IOCs.PDF
Montezuma Creek - Historic Regulated IOCs.PDF
Mexican Hat - Historic Unregulated IOCs.PDF
Mexican Hat - Historic Regulated IOCs.PDF
Le Chee - Historic Unregulated IOCs.PDF
Le Chee - Historic Regulated IOCs.PDF
Antelope Point Marina - Historic Unregulated IOCs.PDF
Antelope Point Marina - Historic Regulated IOCs.PDF

I am copying Yolanda Barney of Navajo EPA on this e-mail since I am forwarding to you data from Region 9's copy of Navajo's drinking water database.

Attached are the historic regulated and unregulated inorganics (IOCs) data for four public water systems on the Navajo Nation that could be impacted by the Gold King Mine Release. These four systems are regulated by Navajo EPA. The data was retrieved from Navajo's DIME database, which stores inventory, chemical, and bacteriological data for the public water systems regulated by Navajo EPA.

Region 9 has a copy of Navajo's DIME. However, there is about a 3 to 4 months lag in the information in the Region 9 version of the database. Navajo EPA would have the most current data.

System Name	Location	Population Served	Water Source
Antelope Point Marina	Coconino County, Arizona	25	Ground water; one well **
Le Chee – NTUA	Coconino County, Arizona	1191	Purchases water from the City of Page
Montezuma Creek – NTUA	San Juan County, Utah	414	Ground water; three wells
Mexican Hat - NTUA	San Juan County, Utah	75	Surface water; intake in the San Juan River

** The Antelope Point Marina water system has an arsenic removal plant, which has been operating since 2008.

NOTES AND THINGS TO KNOW

•□□□□□□□□ If Yolanda Barney wants the four public water systems to be sampled, Yolanda will need to make a request directly to Bret Moxley, the USEPA IC for Farmington. Bret's e-mail is moxley.bret@epa.gov.

•□□□□□□□□ Navajo EPA has primacy for its drinking water program. The link to the Navajo Public Water Supervision Program is http://navajopublicwater.org/.

•□□□□□□□□ The Navajo Nation has its own Safe Drinking Water Act (Navajo Nation Safe Drinking Water Act [NNSDWA]). The link to the NNSDWA is http://navajopublicwater.org/NNSDWA2.html. The NNSDWA is similar to the federal SDWA.

•□□□□□□□□ The Navajo Nation has its own Primary Drinking Water Regulations (NNPDWR). The link to the NNPDWR is http://navajopublicwater.org/NNPDWR2.html. The NNPDWR is generally similar to the Federal National Primary Drinking Water Regulations.

•□□□□□□□□ The Navajo Primary Drinking Water Standards for the regulated contaminants are the same as the federal standards. The Maximum Contaminant Levels (MCLs) for the regulated IOCs can be found at 2010 NNPDWR 203 (Navajo MCLs) and 40 CFR 141.62 (federal MCLs).

•□□□□□□□□ The Navajo and federal Primary Drinking Water Regulations list approved analytical methods for the regulated contaminants. For the IOCs, that information is found in 2010 NNPDWR 405 (Sampling and Analytical Requirements for Inorganic Chemicals) and 40 CFR 141.23 (Inorganic Chemical Sampling and Analytical Requirements). These sections also list the detection limits for each regulated contaminant.

•□□□□□□□□ If analyzing water samples for drinking water compliance, the analytical method used and the field sampling procedures are important, particularly for the heavy metals. For instance, drinking water samples should not be filtered since the MCLs are for total metals and not dissolved metals.

•□□□□□□□□ If the approved drinking water methods are to be used to analyze water samples, the samples must be analyzed by a laboratory that is certified to conduct the drinking water analytical methods.

•□□□□□□□□ When reviewing the attached historic IOC data for each water system, please remember that under the Navajo and federal drinking water regulations, samples for the regulated contaminants are collected after treatment (chlorination is considered "treatment") and before the treated water enters a distribution system. Raw water from a water source is not normally collected for the regulated contaminants since raw water results normally cannot be used to determine compliance with an MCL. However, if there is a treatment process in place other than chlorination (e.g., arsenic removal), raw water samples could be collected to compare the raw water results to the finished/treated water results. Raw water could also be collected for the unregulated contaminants.

•□□□□□□□□ If USEPA is going to evaluate drinking water data, please remember that for public water systems regulated by Navajo EPA, it may be best to use the Navajo MCLs for the contaminants being evaluated especially since Navajo EPA will be using its own standards when making compliance decisions about public water systems they regulate.

Please contact me if you have any questions.

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Bessie Lee

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